

EASTMAN

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CONTAINS NO CBI

June 9, 2017

CBIC Control Number
373948

TSCA Confidential Business Information Center (7407M)
EPA East - Room 6428, Attn: Section 8(e)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, DC 20460-0001

Re: TSCA Section 8(e) Submission for N-(1,3-Dimethylbutyl)-N'-phenyl-p-phenylenediamine (6PPD; CAS# 793-24-8)

Dear Sir or Madam,

The following information is being submitted by Eastman Chemical Company pursuant to current EPA guidance regarding the Agency's interpretation of section 8(e) of the Toxic Substances Control Act (TSCA).

As a manufacturer of 6PPD, Eastman received from the World Business Council for Sustainable Development's Tire Industry Project (WBCSD/TIP) the attached TSCA 8(e) "FYI" notice submitted to the EPA by WBCSD/TIP. Eastman previously submitted a section 8(e) notice (8EHQ-16-20293) in response to information received from the World Business Council for Sustainable Development's Tire Industry Project (WBCSD/TIP) on this substance. Eastman now submits a second 8(e) notice as a result of this new information received from WBCSD/TIP.

Eastman has made no determination as to whether this information represents a substantial risk of injury to health or the environment under TSCA. The submission of this information is intended to discharge any TSCA Section 8(e) responsibilities that might exist for these findings. If you have any questions regarding the information contained in this letter, please contact Dr. Steven Green at (423) 229-2466.

Sincerely yours,



John Hott, Ph.D.
Director
Global Product Stewardship and Regulatory Affairs
Eastman Chemical Company
Kingsport, TN 37660-5075



May 17, 2017

Via Email

Eastman/Solutia Europe
Aramis Building
Leonardo Da Vincilan 1 B-1930
ZAVENTEM, Belgium

Re: Testing Results Regarding 6PPD Reported to the United States Environmental Protection Agency (USEPA)

Dear Eastman/Solutia Europe,

As the Lead Registrant under REACH of 1,3-dimethylbutyl-N'-phenyl-p-phenylenediamine (6PPD), we wanted to make you aware of some information which may become publicly available in the near future regarding 6PPD. This information relates to a so called "FYI submission" to the US EPA pursuant to the Toxic Substances Control Act (TSCA) section 8(e) made by the World Business Council for Sustainable Development's (WBCSD) Tire Industry Project (TIP)¹. A copy of that submission dated April 20, 2017 is attached. As was notified to your company in 2016, TIP intended to repeat some of the testing for 6PPD in order to produce additional results to the results that led to the September 17, 2015 FYI submission, which results were characterized at that time as inconclusive.

We are advised that the usual practice of the US EPA is to post on its publicly accessible website information and/or the actual FYI submissions sent to the US EPA. Using past experience as a guide, this usually occurs approximately 4-6 months after an FYI submission is made to the US EPA. From the point in time that this FYI submission information becomes publicly available, there may be questions from NGOs, journalists and others. TIP is available to meet with Eastman/Solutia to discuss any questions.

The testing which was the subject of the recent FYI submission was performed by a subcontractor of TIP's main consulting firm, Cardno ChemRisk.

As Lead Registrant under REACH, we would expect that your company will lead the effort to notify the supplier base and trade associations about this submission. TIP is not intending to notify the other suppliers or supplier associations. TIP is intending to notify regional tire

¹ TIP is made up of participating companies that, in alphabetical order, are as follows: Bridgestone Corporation, Continental AG, Cooper Tire & Rubber Company, The Goodyear Tire & Rubber Company, Hankook Tire Company, Kumho Tire Company Inc., Compagnie Générale des Établissements Michelin, Pirelli & C. S.p.A., Sumitomo Rubber Industries, Ltd., Toyo Tire & Rubber Co., Ltd., and Yokohama Rubber Co., Ltd.

manufacturers associations – RMA², ETRMA³, JATMA⁴, KOTMA⁵, CRIA⁶ and ATMA⁷. Individual member companies of TIP may independently determine whether each will notify its suppliers.

Additionally, TIP is open to future dialogue with Eastman/Solutia, as Lead Registrant in the context of REACH, if it has any questions or wishes to discuss the recent tests or future studies.

If you have questions after reviewing the FYI submission, or wish to discuss, please feel free to contact the TIP Secretariat, Philippe Fonta.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Fonta', with a stylized flourish at the end.

Philippe Fonta
Secretariat

² Rubber Manufacturers Association (RMA), located in Washington, D.C., United States

³ European Tyre & Rubber Manufacturers' Association (ETRMA), located in Brussels, Belgium

⁴ The Japan Automobile Tyre Manufacturers Association, Inc. (JATMA), located in Tokyo, Japan

⁵ Korea Tire Manufacturers Association (KOTMA), located in Seoul, South Korea

⁶ China Rubber Industry Association (CRIA), located in Beijing, China

⁷ Automotive Tyre Manufacturers' Association (ATMA), located in New Delhi, India

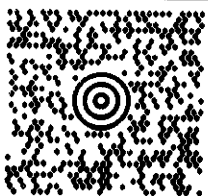
STEVE GREEN
(423) 229-2466
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200 SOUTH WILCOX DRIVE
KINGSPORT TN 37660-5299

LTR

1 OF 1

SHIP TO:

TSCA CONFIDENTIAL BUS INFO (7407M)
U.S. ENVIR. PROTECTION AGENCY
ATTN: SECTION 8(E)
EPA EAST - ROOM 6428
1200 PENNSYLVANIA AVENUE N.W.
WASHINGTON DC 20460-0001



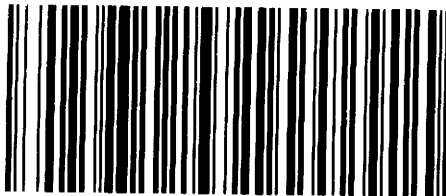
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